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Hearing Date: October 18, 2023

Opposition Date: June 16, 2023

Reply Date: July 31, 2023

Attorneys for Tensyr Limited

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

Adv. Pro. No. 08-01789 (CGM)

SIPA LIQUIDATION

(Substantively Consolidated)

In re

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation
of Bernard L. Madoff Investment Securities LLC
and the Chapter 7 Estate of Bernard L. Madoff,

Plaintiff,

v.

NATIXIS S.A. and TENSYS LTD.,

Defendants.

Adv. Pro. No. 10-05353 (CGM)

NOTICE OF MOTION TO DISMISS THE AMENDED COMPLAINT

PLEASE TAKE NOTICE that, upon the Memorandum of Law in Support of Tensyr Limited's Motion to Dismiss the Amended Complaint and the accompanying Declarations of Christian J. Vandergeest and Ellen Chislett, dated as of the date hereof and exhibits thereto, and all prior pleadings and proceedings herein, Defendant Tensyr Limited ("Tensyr") will move this Court on October 18, 2023, at 10am (prevailing Eastern time), or as soon thereafter as counsel may be heard, for an order dismissing the Amended Complaint (ECF No. 193) filed by Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC, with prejudice, pursuant to Rules 12(b)(2) and 12(b)(6) of the Federal Rules of Civil Procedure, made applicable here by Rule 7012 of the Federal Rules of Bankruptcy Procedure.

PLEASE TAKE FURTHER NOTICE that, pursuant to the Stipulation and Order entered on January 10, 2023, any opposition to the Motion shall be filed by June 16, 2023, and any reply in further support of the Motion shall be filed by July 31, 2023.

Dated: New York, New York
April 17, 2023

Respectfully submitted,

FRESHFIELDS BRUCKHAUS DERINGER US LLP

By: s/ David Y. Livshiz

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